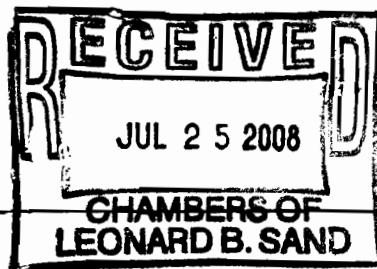


MEMO ENDORSED



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 24, 2008

BY FACSIMILE TO 212-805-7919

Honorable Leonard B. Sand
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Joseph P. Collins,
07 Cr. 1170 (LBS)

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 7-30-08

Dear Judge Sand:

The Government respectfully requests that it be provided an additional week to respond to the pretrial motions filed by the defendant in the above-referenced matter. The defendant seeks from the Court an order: (1) requiring the Government to provide a bill of particulars; (2) admitting polygraph evidence or scheduling an evidentiary hearing regarding the same; and (3) requiring the Government to produce Brady material immediately and Giglio and 3500 material at least two months before trial. The Government has been working on its response diligently, but the press of other, unanticipated business necessitates the Government to request additional time. The Government's response was originally due July 25, 2008, and the defendant's reply was due August 8, 2008. Should the Court grant the Government's request, the Government's response would be due August 1, 2008, and the defendant's reply would be due August 15, 2008. Defense counsel consents to this request. Trial in this matter is scheduled for April 6, 2009.

Very truly yours,
MICHAEL J. GARCIA
United States Attorney

By:

Christopher L. Garcia/Neil M. Barofsky
Assistant U.S. Attorneys
(212) 637-2372/2370

Baron
JD Sand
7/30/08
7/30/08

cc: William Schwartz, Esq. (via facsimile to 212-479-6275)
Jonathan Bach, Esq.

MEMO ENDORSED